

June 7, 2013
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IDAHO PUBLIC
UTILITIES COMMISSION

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF PACIFICORP)	CASE NO. PAC-E-13-05
DBA ROCKY MOUNTAIN POWER'S)	
2013 INTEGRATED RESOURCE PLAN)	PETITION TO INTERVENE OF
		THE SNAKE RIVER ALLIANCE

The Snake River Alliance, pursuant to the Idaho Public Utilities Commission's Rules of Procedure Rule 72 and 73 IDAPA 31.01.01.072 and -.073, and in response to Order No. 32819, petitions the Commission to grant its request for intervention in the above-referenced case, PAC-E-13-05. The name and address of this intervenor is:

Snake River Alliance
Box 1731
Boise, ID 83701
208 344-9161 (o)
208 841-6982 (c)

The Snake River Alliance is represented in this proceeding by Ken Miller. Correspondence in this docket can be sent to the above address or via e-mail to: kmiller@snakeriveralliance.org. To reduce costs and environmental impacts of exchanging information in this case, the Alliance requests that, pursuant to IPUC Rules 31.01.01.063.02 and 03, information other than that which might be deemed confidential or otherwise must be hand-delivered be provided electronically and/or via email to the above address.

The Snake River Alliance is an Idaho-based non-profit organization, established in 1979 to address Idahoans' concerns about nuclear waste and safety issues. In early 2007, the Alliance expanded the scope of its mission by becoming Idaho's first nonprofit clean energy advocacy

organization. The Alliance's energy program includes advocacy for renewable energy resources in Idaho; expanded conservation and demand-side management programs offered by Idaho's regulated electric utilities and the Bonneville Power Administration; and development of local, state, regional, and national initiatives to advance sustainable energy policies, including electric utility rate structures and designs that promote energy conservation. The Alliance pursues these programs on behalf of its members, many of whom are customers of PacifiCorp/Rocky Mountain Power in eastern Idaho.

The Alliance and those it represents have a direct interest in this case for several reasons. As the Commission is aware, the Alliance has expressed myriad concerns regarding the intent of PacifiCorp DBA Rocky Mountain Power and its coal plant partner, Idaho Power, to undertake significant investments in their assets at the Jim Bridger coal plant in Wyoming. PacifiCorp's 2013 IRP (and by extension Idaho Power's pending 2013 IRP, which will be filed with the Commission on June 28, 2013) is based in part on whether its coal investments will be shown to be prudently incurred and in the best interests of customers. As this Commission knows, the Alliance asked for and intends to raise similar issues when Idaho Power files its 2013 IRP and corresponding Certificate of Public Convenience and Necessity (CPCN) application for the Jim Bridger investments. Those issues are currently the subject of debate before the Oregon PUC and will eventually come before this Commission.

The Snake River Alliance has for three years been Idaho's leading voice in challenging coal-fired electricity generation to meet Idaho's electricity load. On March 11, 2013, it provided extensive comments on this issue in Idaho Power's 2011 Case, IPC-E-11-11, in response to Idaho Power's 2011 "IRP Updates," with regard to plans by both utilities to undertake significant capital investments in their jointly owned coal plants at Bridger. Unfortunately, those comments as well as Idaho Power's 2011 IRP Update, were placed in a "closed case" docket and not readily available for public review or comment, yet some of the issues contained therein will likely come before the Commission in this case.

We believe this case will present the Commission with many of the issues identified in the case referenced above, primarily the data underlying PacifiCorp's proposed investments in some of

the units in its coal fleet. This has direct impacts on the Alliance's constituents and others in Idaho who would bear the burden of these costs.

Of particular concern to the Alliance is the availability for inspection of any documents deemed confidential or otherwise not made public by PacifiCorp. Once granted intervenor status, the Alliance anticipates filing to access the information supporting this IRP but that which is not normally made available for public inspection.

Such provisions are allowed in other jurisdictions in which PacifiCorp operates; we will ask Idaho regulators to make similar provisions to allow for full review of the company's filing here. This is not a typical procedure for an IRP filed with the Idaho PUC, but we anticipate making this request for subsequent IRPs after this one.

Until now, we in Idaho do not normally confront IRPs that contain confidential information not otherwise made available to the public, but we know that in this case and with the pending Idaho Power IRP case that this may become an issue for the Commission to consider.

There are other issues contained in PacifiCorp's 2013 IRP, such as the Company's proposed portfolio and its demand response plans, that will be discussed in depth before this Commission in this proceeding, and Alliance expects to participate in those discussions as well.

The Alliance believes it and those it represents have direct interests in this case, that its participation as in intervenor will not complicate or extend this case, and that it will to the extent granted by Commission rules participate in this case.

The Alliance therefore requests that the Commission grant its request to participate in this case as an intervening party and that it be allowed to participate in this case on behalf of its constituents.

Therefore and pursuant to Rules 72 and 73 of the Commission's Rules of Procedure, IDAPA 31.01.01.072 and 073, the Alliance requests that this petition to participate in Case No. PAC-E-13-05 be granted.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Ken Miller".

Ken Miller
Clean Energy Program Director
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